

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 18-CR-154 (PP)

VAN MAYES,

Defendant.

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**UNITED STATES' REPLY TO DEFENDANT'S OBJECTION TO THE MOTION  
TO REASSIGN A RELATED CRIMINAL CASE**

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The United States of America, by United States Attorney Matthew D. Krueger and Assistant United States Attorneys Gregory Haanstad, Christopher Ladwig, and Phillip Kovoor, hereby moves the court pursuant to Criminal L. R. 13 to reassign the defendant's case into the Honorable Judge Pamela Pepper's court. The defendant's case is based on a similar set of facts, events, witnesses, and offenses as *U.S. v. Toronse Carter* (17-CR-190) and *U.S. v. Charles Edwards* (16-CR-159), which are currently assigned to Judge Pepper.

These defendants' cases are factually connected to widespread rioting and looting in the area surrounding Sherman Park that occurred on August 13, 14, and 15, 2016. Mayes', Edwards', and Carter's cases all stem from the same facts and their discovery is the same. In particular, Mayes' and Edwards' case have exactly the same witnesses, factual context, and suspects. In his most recent motion, the defendant has misconstrued

a competency proceeding as changing the facts, events, witnesses, and criminal charges. A competency proceeding has no ramification on a Criminal L. R. 13 determination, which is based on the facts, events, witnesses, and criminal charges.

By consolidating all the cases before Judge Pepper, it will certainly save judicial resources by ensuring the district court judge is familiar with the witnesses, facts, and the connected legal issues related to witnesses, search warrants, and subpoenas. Also, the defendant's previous motions highlight how these cases are strongly connected. There will also not be a delay in proceedings in any of these cases. For all of the foregoing reasons, the United States of America respectfully requests that *U.S. v. Mayes* be reassigned to Judge Pepper's court.

Respectfully submitted this 10th day of June 2019.

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